

CHANEL BATTLE,

Plaintiff,

vs.

OUTBACK STEAKHOUSE OF
FLORIDA, LLC, OUTBACK
STEAKHOUSE, MERRILLVILLE,
INDIANA

Defendants.

Comes now Plaintiff, CHANEL BATTLE, by counsel, Tolbert & Tolbert, LLC, and for her cause of action against the Defendants, OUTBACK STEAKHOUSE OF FLORIDA, LLC and OUTBACK STEAKHOUSE, MERRILLVILLE, INDIANA (hereinafter referred to as “Defendants”), states as follows:

4. That on or about June 17, 2017, Plaintiff, CHANEL BATTLE, was an invitee on the premises of the Defendants, located at 1590 E. Lincoln Highway, Merrillville, Lake County, Indiana 46410.

5. That at said date and time, the Defendants had a duty to maintain the premises in a reasonably safe condition.

6. That at said time and place, the Defendants were negligent and at fault in maintaining, operating, inspecting, and warning those on its premises so as to create an unsafe condition for the Plaintiff, CHANEL BATTLE, and others similarly situated, and were otherwise negligent.

7. That as a direct and proximate result of said fault by the Defendants, the Plaintiff, CHANEL BATTLE, sustained injuries, some of which may be permanent and lasting, has incurred doctor and medical expenses, and may continue to incur doctor and medical expenses in the future, has incurred pain and suffering, mental and emotional distress, and may continue to incur pain, suffering and distress in the future.

WHEREFORE, Plaintiff, CHANEL BATTLE, prays for judgment against the Defendants in an amount that will reasonably compensate her for her damages and losses in the above-referenced matter and that the Court award all other damages which are just and proper in the premises.

Respectfully Submitted,

TOLBERT & TOLBERT, LLC

/s/Michael E. Tolbert
Michael E. Tolbert, #22555-64
1085 Broadway, Suite B
Gary, IN 46402
(219) 427-0094
Attorney for Plaintiff

JURY DEMAND

Plaintiff demands trial by jury on all issues.

Respectfully Submitted,

TOLBERT & TOLBERT, LLC

/s/Michael E. Tolbert
Michael E. Tolbert, #22555-64
1085 Broadway, Suite B
Gary, IN 46402
(219) 427-0094
Attorney for Plaintiff